

Exhibit K

Teri Roldan

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

AFFIDAVIT OF
TERI ROLDAN

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF QUEENS)

TERI ROLDAN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 35 West 13th Road, Broad Channel, New York 11693.

2. I am currently 37 years old, having been born on June 5, 1984.

3. I am the daughter of Daniel O'Sullivan, upon whose death my claim is based, and I submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from pancreatic cancer on February 25, 2017, at the age of 58. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I am my father's only child. It was just me and my father when I was growing up. My parents were divorced, so my dad was a single father. We spent a lot of time together. He was my softball coach, and he always took me into the city to see Broadway shows and plays. We definitely had a special relationship. He was also a wonderful grandfather to my three children. I miss him a lot.

6. My father worked for the Department of Transportation. He was working in construction, helping build bridges over the pile for first responders. He worked at the World Trade Center site for months. My father described the scene as horrible. He said there was debris everywhere, and it was hard to breathe. He saw bodies and body parts strewn everywhere. He often cried when telling me how terrible it was. All he witnessed definitely affected his mental health, as well as his physical health. He developed PTSD as a result of his experience.

7. In early 2017, my father started to not feel well. We took him to the hospital, where they ran some tests. He was diagnosed with stage IV pancreatic cancer almost immediately. I was shocked because he seemed like a generally healthy person. We didn't expect anything like this to happen. The cancer hit him like a ton of bricks.

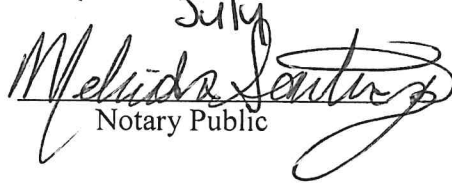
8. I, my uncle and my aunts, took turns taking care of my father at the hospital. As his only next of kin, I had to plan the funeral and make decisions about his estate. It required me to take a lot of time off from work. I not only lost weeks of work, but I had to spend time away from my children. I would drive into the city every day to see my father in the hospital. At the end of the day, the only thing that mattered to me was that I spend as much time as possible with my father before he died. He was deteriorating so quickly that my head was spinning. I knew there wouldn't be much time. I had to have the uncomfortable conversation with my father while he was lying in a hospital bed about what he wanted in terms of a funeral. No one ever wants to have that talk with their parent. After he passed, I immediately had to make all the arrangements for his funeral.

9. I don't have a father anymore, and I am only 37 years old. My kids don't have a grandfather. They don't have any other grandparents. It breaks my heart for them. Not a day goes by that I don't wish that I could have done more for my dad. I have no siblings, it's truly a

horrible feeling to be alone like this.


TERI ROLDAN

Sworn to before me this
7 day of ~~May~~, 2022


Notary Public

MELINDA SANTIAGO
NOTARY PUBLIC-STATE OF NEW YORK
No. 01SA6403068
Qualified in Queens County
My Commission Expires 01-19-2024

Brian O'Toole

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

**AFFIDAVIT OF
BRIAN O'TOOLE**

20-CV-00415 (GBD)(SN)

STATE OF NEW YORK)
 : SS.:
COUNTY OF ROCKLAND)

BRIAN O'TOOLE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 11 Garrecht Place, West Nyack, New York 10994.
2. I am currently 37 years old, having been born on October 5, 1984.
3. I am the son of Joseph O'Toole, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from bile duct cancer on December 12, 2016, at the age of 61. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I had a good relationship with my father, and he was always there for me whenever I needed something. For example, he always chaperoned my school field trips growing up. I would also do canoeing and kayaking, and he would always be there helping out and moving the boats around from place to place. He was a busy man, working both as a firefighter and laying carpet and doing other jobs on the side. I enjoyed going to work with him and helping lay carpet when I got older. I would also do overnight trips down at the firehouse with him. These experiences rubbed off on me, as I am now in the firehouse myself. I had a good and happy childhood growing up with my father.

6. My father began working at Ground Zero in the weeks following 9/11, and he continued to work down there for about six months. He was a fireman and took a detail from his firehouse in the Bronx to assist with the rescue and recovery efforts at Ground Zero. He was there until the very last day of these efforts, so his exposure to the toxins resulting from the attacks was relatively high. He felt like he had to be there. That was who he was – he always wanted to help out.

7. My father enjoyed sailing and went on a trip to Bermuda for a race. When he came back, his eyes and skin were noticeably yellow. We were concerned it might initially be some unusual sunburn or sun poisoning. My aunt is a nurse at Memorial Sloan Kettering Cancer Center, and she recognized that it could be something different. She insisted that my father go to the doctor to get checked out. During this doctor's visit, my father learned that he had cancer.

8. He began going to Sloan Kettering for treatments after his diagnosis. We lived outside of New York City in the Rockland County area, and so our family started a rotation of who would take my father to his treatments and sit with him while he was there. There were additional

financial expenses for us taking him to these treatments, such as the travel and parking costs when going in and out of the city. Sometimes, we would have to miss work as well, but helping my father was something that needed to be done.

9. My father also needed to spend a few months in the hospital while undergoing his treatments because the toxins were affecting his mental ability – it was like he was in a mental fog. My family would take turns staying with my father while he was hospitalized. He would have to stay in the hospital until it was under control and then resume his outpatient treatment routines.

10. My life is very different without my father. Since he passed away, he has lost out on some important family events. My wife and I now have three children, but my father was only alive to meet my daughters, the two oldest. I now have a son, and it saddens me that my father is not around to meet his grandson. He never had the opportunity to play around or joke with him. My son is much like I was as a kid, so it would have been funny to see how my father would have reacted when seeing him. My father was always working to support the family as a fireman and with his side jobs while we were growing up, so it could have been an opportunity to make up for that lost time by spending some with the grandchildren.

11. I would always help my father with his projects around the house. I am now continuing with various projects, but he is not there to work on them with me. It was time that we were able to spend together that is now lost.

12. My father left a significant impact and legacy. Our street has since been renamed after him in his honor. I am happy to see this but also sad at the same time. I have the same feeling when seeing his friends from the firehouse who sometimes stop by and share stories of him. Even

my friends still talk about my father. I still have dreams of him, but I wake up in the morning and realize he is no longer with us. That always makes me sad.


BRIAN O'TOOLE

Sworn to before me this
13th day of ~~June~~ ^{July}, 2022


Notary Public

LORI GAI GANO
NOTARY PUBLIC, STATE OF NEW YORK
REGISTRATION NO. 01GA6346324
QUALIFIED IN ROCKLAND COUNTY
COMMISSION EXPIRES 08/08/2024

Christine O'Toole

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al,

AFFIDAVIT OF
CHRISTINE O'TOOLE

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF ROCKLAND)

CHRISTINE O'TOOLE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 11 Garrecht Place, West Nyack, New York 10994.
2. I am currently 63 years old, having been born on November 28, 1958.
3. I am the wife of Joseph O'Toole, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My husband passed away from bile duct cancer on December 12, 2016, at the age of 61. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. I had been together with my husband since I was 19 years old, and we were married when I was 20 years old. We spent 38 very happy years of marriage together, and we were

together constantly. We took trips and vacations together, going on several cruises with our family and also to Ireland. He was not only my husband – he was my best friend and brother. I do not have siblings of my own, so he was everything to me. We raised three children together, and my husband was around to meet five of our now eight grandchildren. He was a phenomenal husband, father, and grandfather, and he was the kindest man you could ever want to meet.

6. When the planes struck the World Trade Center on 9/11, Joseph worked a side job. By 11:00 a.m. that morning, though, he got called to his firehouse in the Bronx and immediately went there. He traveled to Ground Zero to assist with the search and recovery efforts that night. I believe he was there for the next 48 to 72 hours straight, as I had no contact with him during this initial period. He was then permanently assigned to work at Ground Zero, and I believe he spent nine months working there until that following June. We did not see him much during this period, as he was constantly either at his firehouse or down in the World Trade Center area.

7. My husband was an avid sailor, and he was competing in the Newport to Bermuda sail in 2012. On the way back to Newport, he served as captain and got sick – the first time I remember him getting seasick. He came home a few days later and had a pain in his side and was not feeling well. He woke up still sick the following day, so I told him that he needed to see the doctor. A few days later, on Sunday, we went to my daughter's house for dinner, and by this point, my husband's appearance had become noticeably yellow. He saw the doctor that Monday, and he was immediately sent for several tests. They were unable to do a biopsy, though, and we went down to Memorial Sloan Kettering Cancer Center that following Thursday after being in touch with his sister, who worked there as a nurse. He was admitted, and after many more tests, we learned that he had bile duct cancer that evening. He would undergo his first surgery that next day.

8. Throughout my husband's treatments and illness, I was constantly with him. I tried not to leave him, and as soon as I was allowed to stay overnight with him in the hospital, I did. I would occasionally rotate an overnight with my children so that I could go home and shower, among other things, but I would return to be with him as soon as I could. I was with him almost 24 hours a day and became his caregiver. He often had several side effects from the cancer and treatments, so I needed to be constantly available to help him. I often needed to rush him to the hospital on short notice. And from the feeling of always needing to be ready to help my husband while he was sick, my sleep is still negatively affected even in the middle of the night.

9. My husband's cancer diagnosis and treatment had an immediate and severe financial impact on our family. The insurance did not cover the visit to Sloan Kettering or that first surgery he needed the following day. Until we got financial support after his cancer was linked to his exposure at the World Trade Center, these bills amounted to the many thousands of dollars. These, together with other medication costs, were in the tens of thousands of dollars in out-of-pocket expenses for his medical care. We had to use most of our savings to cover these costs.

10. We continued to have financial difficulty after my husband passed away. He used to take care of everything, especially our house. But after he passed away, I needed to use the life insurance money for his funeral. And in the aftermath of this, I could no longer afford our home. I was forced to sell it to my son. Fortunately, he made an apartment for me to live in downstairs. I also had to stop working because it became too stressful. I was working in real estate and seeing couples together going to buy homes was too difficult for me.

11. My husband's illness was a horrible experience for me, and there are almost no words to describe it. Watching somebody you love struggle with cancer is horrific. I now take medication due to what I witnessed because I basically went through everything my husband went

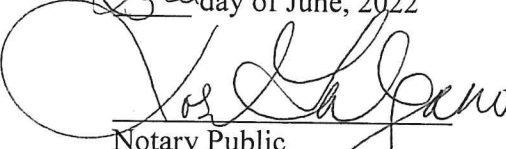
through. While he was still alive, I tried my best to have a happy and supportive appearance for my husband, but the reality of the situation was very stressful for me. It was very difficult.

12. I no longer have my husband with me, and I feel absolutely alone. Seeing couples reminds me of my husband and makes me sad. I feel I was robbed of him, and it hurts me every day.



CHRISTINE O'TOOLE

Sworn to before me this
13th day of June, 2022



Notary Public
LORI GAI GANO
NOTARY PUBLIC, STATE OF NEW YORK
REGISTRATION NO. 01GA6346324
QUALIFIED IN ROCKLAND COUNTY
COMMISSION EXPIRES 08/08/2024

Jeannette Pelt (Kenny)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al,

**AFFIDAVIT OF
JEANNETTE PELT (KENNY)**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF ROCKLAND)

JEANNETTE PELT (now known as JEANNETTE KENNY), being duly sworn, deposes
and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2 Loran Court, Nanuet, New York 10954.
2. I am currently 42 years old, having been born on July 8, 1979.
3. I am the daughter of Joseph O'Toole, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from bile duct cancer on December 12, 2016. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I had a great relationship with my father. When I was little, we would do everything together, and so he jokingly called me “his other wife.” For example, I would go to firefighter functions with him if my mother was not going, help him with side jobs, and sail with him. And when my kids were born, he was at my house all the time and would help out with them. I lived only a few blocks away from my parents, so my father would walk over almost every other morning. We were very close, and my kids also developed a great relationship with him. He helped me with whatever I needed and even helped remodel my house. I have some amazing memories with him before he got sick.

6. On 9/11, I remember that my father made his way down to his firehouse before traveling to Ground Zero. He was the type of person who needed to be there to help his “brothers,” as he called his fellow firefighters. He began by helping with the search and recovery efforts at Ground Zero and continued by helping with the later cleanup efforts. Together, I believe he worked down in the World Trade Center area for about two years.

7. I noticed my father looked jaundiced. He was feeling ill and went to the doctor to get checked out. The doctor immediately realized something was wrong, and in the first 48 hours, he would already have surgery and receive his cancer diagnosis. It all happened very fast, and I was at the hospital with him and the rest of my family when we learned of his cancer.

8. While my dad was undergoing treatments and needed to travel to the hospital, there were many times when my siblings and I would have to take off work to go with him. I also remember several times when we had to wake up in the middle of the night to bring him to the hospital. And when my father went into surgery for the first time, he did not want to be alone. So, my family and I took turns being with him and staying with him overnight. There were plenty of

times I would be at the hospital overnight and needed someone to watch my children for me. There were also many emergencies with my father's health that we all needed to be on call for.

9. It is hard for me to explain the hole left behind when my father passed away. It is very sad for my kids and me that he is no longer there for us. For example, I recently got remarried, and he could not be there for the celebration – we only had a photo of him. I am constantly reminded of him too. My son enjoys listening to the classic rock, like the Beatles or Queen, that my father liked, and my daughter will often wear his old sweatshirts.

10. My kids were the oldest grandchildren. While it is sad that they are no longer able to spend time with their grandfather, I am glad that they got to meet him and can hold onto their own memories of him. My siblings now have children, but their children were either too young or were born after my father passed away. Unfortunately, they will never be able to spend time with and make their own memories with my father. They have to rely on the stories and memories of others.

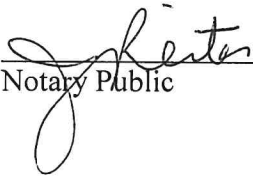
11. My father has missed out on a lot since his passing. Besides my wedding and the new grandchildren, I also no longer have the ability to call him. I wish I were able to call him when I accomplish something.

12. My father's legacy is his family. I realize now that he was the glue that smoothed relationships and brought everyone in the family together, both for the immediate and extended

family. We miss my father and are still hurting from his loss.

 6/27/2022
JEANNETTE (PELT) KENNY

Sworn to before me this
27 day of June, 2022


Notary Public

JEANINE M. REITER
Notary Public State Of New York
Qualified In Rockland County
Lic. #01RE6054404
Commission Expires February 5, 2023

Elizabeth Zuck

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al,

Plaintiffs,

**AFFIDAVIT OF
ELIZABETH ZUCK**

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF BERGEN)

ELIZABETH ZUCK, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 15 Degray Terrace, Mahwah, New Jersey 07430.
2. I am currently 41 years old, having been born on December 2, 1980.
3. I am the daughter of Joseph O'Toole, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from bile duct cancer on December 12, 2016. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. I had a great relationship with my father. He was the ultimate family man and the hardest worker I have ever met. He worked multiple jobs to give us the best life he possibly could,

and he did just that. I had a very happy childhood with him, and whenever he was not working, he was home with us. He was constantly present and playing with us as kids. None of this changed as we got older either. He was a fun, friendly, and selfless person who was the life of the party. For him, it was always about everyone else and their well-being – he put himself last. I believe this is what led him to become a firefighter.

6. My father traveled to Ground Zero shortly after the collapse of the World Trade Center to assist with the search and recovery efforts. His firehouse was in the Bronx, and he signed up for the detail at Ground Zero. He was on “The Pile,” as they would call it, the whole time, often for 12-hour shifts. He found bodies and body parts during his time there. Despite wearing a mask and taking other precautions, he was still exposed to a lot of the dust and other debris due to the amount of time he spent at Ground Zero. A lot of this dust would come home with him stuck to his clothes even after he tried to wash it off. He often stayed in the area outside his shifts, sometimes sleeping at the nearby St. Paul’s Chapel.

7. My father enjoyed sailing and took a trip to Bermuda, as he had done many times before. After a three-week sail, he came back home and had a very yellow appearance – both his skin and eyes were yellow. We thought it might have been his diet initially, as you often eat a lot of seafood on these sailing trips. We went to my sister’s house for a Sunday dinner, and he walked in. I had not seen him for a few days, and his appearance had already gotten worse. He and my mom made an appointment with the doctor for the next day. That doctor immediately sent him for an MRI that evening. I remember getting a call from my mom, who was crying hysterically, telling me that they had found a mass. She was petrified and was convinced the mass would be cancerous. She did not want to be alone either, so I immediately left work to go and be with her and my dad.

8. I called my aunt, a nurse at Memorial Sloan Kettering Cancer Center, and explained the situation to her. She told me to bring him for an appointment that Thursday at 6:00 a.m., so my father, mother, brother, and I all went down together. My father underwent many tests – MRI, CT scan, and blood tests. We were waiting together in the room when the doctor came in and confirmed my mother's fear. That is when we learned of my father's cancer diagnosis.

9. My father seemed to be in shock with the diagnosis. My mother and I were both very emotional and crying, and we realized that our lives would never be the same. It was going to be the beginning of an awful journey for all of us. It was a lot to take in at that moment. I will never forget it and how difficult it was.

10. My father immediately began undergoing treatment for his cancer, and he had emergency surgery the day after his diagnosis to have a tube for drainage put in. He would have another surgery a few months later and start chemotherapy treatments in the meantime. It was the start of many backs and forth to the city for our family, especially when my father needed to stay overnight at the hospital.

11. That surgery proved to be the beginning of the end for my father. He needed someone to be with him at all times. We did not want him to be alone at the hospital either, so my family essentially broke up the time with him into shifts. My mother would spend all day with him, and I would spend nights with him, depending on my and my brother's schedules. I was still working during the daytime and would rush to the city after work to relieve my mother and spend the night with my father. This was very difficult for me emotionally and physically, as it was exhausting. I was pregnant for a portion of his care, especially near the end of his life, which contributed to the physical exhaustion. It was still tiring even when he was at home, as we would sometimes need to bring him back to the hospital in the middle of the night if he did not feel well.

It was a constant time commitment for my family, but we did our best to ensure he was cared for and comfortable.

12. He had been such a strong, proud, and selfless man. He needed to put that all to the side because he now needed help. I remember different instances where we needed to help him just so he could go to the bathroom and needing help in such a way must have been very difficult for him.

13. Seeing my father ill and watching him die before my eyes took a severe emotional toll on me. My brother and I both got married in the last year of his life, about six months apart. In those six months, his health noticeably declined. I was expecting too shortly after I was married, and my father held on as best he could while I was pregnant. Around Thanksgiving time, about two weeks before I was due to give birth, his health took a severe turn for the worse. Our whole family was with him in the intensive care unit when he took off his oxygen mask and told us all that he was “done.” It was very hard for us to hear, and I told him to hang on just two more weeks until my son was born. He did, and he managed to meet my son once. He would pass away only ten days after my son was born. The combination of being a first-time mother, postpartum depression, and my father’s death was tough for me to handle.

14. Besides the emotional impact my father’s illness had on my family and me, there was also a financial impact. Throughout our trips to New York City and other travel, we incurred additional expenses such as tolls, gas, and parking. While small individually, these expenses do add up significantly over time. Some of my father’s medication was not covered by insurance initially either, so those were out-of-pocket expenses at the beginning. The costs of these medications amounted to thousands of dollars.

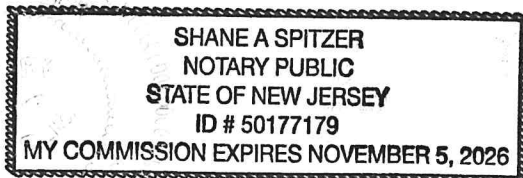
15. My father has missed out on many important family events since he passed. While he did meet my son once, he has missed out on the now more than five years of my son's life and never got to meet my two other children. I wish he would have been around to spend time with us and see my children grow up.

16. I do not want my father to just be another firefighter who got sick after 9/11. He was a human, and he was my dad, a very kind and selfless man. The world is missing a massive piece without him.


ELIZABETH ZUCK

Sworn to before me this
22 day of June, 2022


Notary Public



Jenna-Lyn Petrone

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF
JENNA-LYN PETRONE**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF RICHMOND)

JENNA-LYN PETRONE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 18 Pacific Avenue, Staten Island, New York 10312.

2. My current age is 31, having been born on May 20, 1990.

3. I am the daughter of Robert Petrone, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from bladder cancer on December 12, 2016. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad was an amazing father. He did anything and everything he could for us. He took us to hockey games, Mets games, amusement parks—whatever we wanted. And he would always invite our friends. He wanted to give my sister and me the best life growing up, no matter what. Especially as a single father, I know it must have been hard for him. But he gave us a great childhood.

6. On September 11th, 2001, I was only in sixth grade. My father responded to the World Trade Center site either on 9/11 or 9/12/2001. Either way, he was there very soon after the attacks. He was a retired NYPD officer, and he got a call from one of his previous partners in the police force. His former partner said, "We're going." He went to do clean-up and recovery. He knew he had to be there, to do whatever he needed to do to help. He worked there for at least two weeks. My dad never really talked to my sister and me about it, because we were only kids at the time. I remember he showed us some photos from the site. The police officers didn't talk about it, and they didn't want to talk about it because it was so scarring.

7. When my dad was diagnosed with bladder cancer, he hid it from us for a while. We learned of his diagnosis in late October 2013. He sat us down and told us what was going on. He tried to reassure us that everything was going to be okay. He tried to wait to tell us at a good time, but of course there's no good time to tell someone you have cancer.

8. He underwent multiple chemotherapy treatments and surgeries. He did other types of experimental treatments after two rounds of chemo, when the doctors decided that the chemo wasn't working.

9. My sister and I took my dad to appointments whenever he needed someone to drive him. At the time, he was living with his girlfriend, so we would help her out whenever she needed. Even just picking up food for him. I would bring him a chicken parm hero just to make him smile. I would visit him just to sit and talk with him, and I would go see him in the hospital to keep him company.

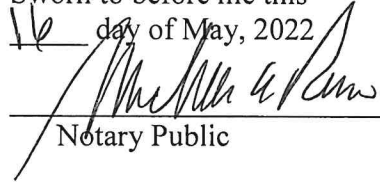
10. Nothing is the same since his death. Emotionally, it's hard sometimes. I just got married. It was really hard for me knowing that I would have to walk down the aisle at my own wedding without my father. I think about him every day. It's hard that he's not here for major life events. A lot has changed since his passing. It hurts to know that I can't pick up the phone and talk to my dad whenever I want. My dad and I had a great bond when it came to sports. I would always call him just to talk about a Rangers game. Now, I can't do that. I was only 26 years old when my father passed away, and many life milestones have happened for me in the past few years that I haven't been able to share with him.

11. My father was an amazing person. He was just the life of the party. He knew how to make anyone who was having a bad day feel better. He would meet someone once, and they would remember him. Everyone remembers him. He would do anything for anyone. He'd give

the last dollar in his pocket to a stranger. He was the most caring, funny, great person. He is truly missed by everyone.


JENNA-LYN PETRONE

Sworn to before me this
16 day of May, 2022


Notary Public

MICHELLE A. RUSSO
NOTARY PUBLIC, STATE OF NEW YORK
01RU6119903
QUALIFIED IN RICHMOND COUNTY
EXPIRES 12/06/2024

Leanna Petrone

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

AFFIDAVIT OF
LEANNA PETRONE

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF RICHMOND)

LEANNA PETRONE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 147 Burke Avenue, Staten Island New York 10314.

2. My current age is 33, having been born on June 15, 1988.

3. I am the daughter of Robert Petrone, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from bladder cancer on December 12, 2016, at the age of 59. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father and I were very close. He was just an amazing father. My sister and I had a difficult childhood, as our mother was very sick growing up and our parents got divorced. Despite that, all I remember is that my dad took care of us. Everything he did was for my sister and me. He worked many jobs to support us. There were a lot of bills to pay. He sent my sister and me to the best Catholic private schools. We never went without. He took us on vacation

with our friends. Any sport we had an interest in, my dad would buy us the equipment and practice with us. When we were teens, our mom moved to Florida, and my sister and I moved in with our father full-time. We had a great family life. He even took care of my sick mother, who was his ex-wife. He paid for everything for her—bills, groceries, anything she needed—out of the goodness of his heart. He never wanted the burden to fall on my sister and me.

6. On September 11, 2001, my father responded to Ground Zero almost immediately. He was a retired NYPD officer, and he and his former partner rushed to the scene right away. He was there for two weeks to help with rescue and recovery, doing what he could. He didn't tell us much about what he saw at the World Trade Center. He told me it was really difficult, but he didn't like to talk about it.

7. When my father got sick, he tried to protect us in any way possible from the news. Only after he passed did I find the documents of his original diagnosis. He had biopsies done a few days before my engagement party, in early October 2013. Those biopsies showed he had bladder cancer. He didn't tell us he was diagnosed with cancer until the end of October. He was in a lot of pain, but always hid it from us. He wrote letters describing his pain, which I also found after his death. It was hard to read. My father went through chemotherapy three out of every four weeks starting in October, through the end of 2013, and again from January to April 2014. He had a terrible reaction to the medication, and he lost all his hair. I'll never forget having to shave his head. In January 2014, he had a major, eight-hour surgery to remove his tumor. He had his bladder re-sectioned. I was only 25 years old at the time, and I had never seen him in so much pain. Reading his letters, I now know that he felt even worse than what he let on.

8. My sister and I would take him to doctors' appointments, chemotherapy treatments, and surgical procedures. We would help him out at home as much as we could. It was so hard watching him deteriorate, as he was very healthy before the cancer. I had never seen him sick before. In April 2014, the doctors told my father he was cancer free. But in August 2014, the cancer came back worse than before. It was stage IV and had already spread through his body. He had experimental treatments for another two years before passing away.

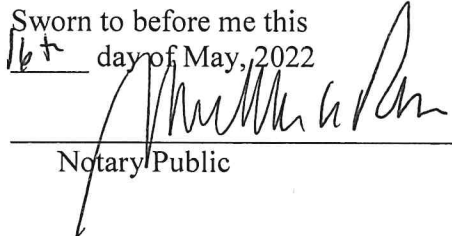
9. I was only 27 years old when my father died. I was just beginning a time in my life where things were really starting to happen for me. I had just started a new job and was getting married. I followed in my dad's footsteps, becoming a police officer just like him. It was

an exciting time, and it was all put on hold when my dad got cancer. To see him so sick and to watch him have to cancel plans because he didn't feel well enough to leave the house was heartbreaking. We were all supposed to go to Australia to visit family, but he had to cancel after his cancer diagnosis. I can't even put it into words how much it hurt to see my father in pain.

10. Everybody loved my father. Even the people who he disagreed with loved him. People loved him because they knew he'd always be there for them. Losing him was a loss not just for my sister and me, but for our community. Some people who only met him once still talk about their experience with him. He welcomed people with open arms. He genuinely was a special person.


LEANNA PETRONE

Sworn to before me this
16th day of May, 2022



Notary Public

MICHELLE A. RUSSO
NOTARY PUBLIC, STATE OF NEW YORK
01RU6119903
QUALIFIED IN RICHMOND COUNTY
EXPIRES 12/06/2024

Caryn Pfeifer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

AFFIDAVIT OF
CARYN PFEIFER

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

CARYN PFEIFER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 30 Ballard Lane, Hicksville, New York 11801.
2. I am currently 60 years old, having been born on January 9, 1962.
3. I am the wife of Raymond (Ray) Pfeifer, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. Ray passed away from kidney cancer on May 28, 2017 at the age of 59. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. Ray and I were best friends and had a great relationship. Even though we each led busy lives, we did a lot together. We loved to go to the beach, shopping, gardening, and working on the house. We would take our kids to sporting events, and Ray would coach the kids' sports teams. We loved boating and being on the water. We also did a couple of vacations. I'm one of nine children and Ray was one of seven children, so we had lots of big family celebrations. I worked full time, and Ray worked crazy hours with the FDNY, but we always

made time for our family.

6. On September 11th, Ray went down to the World Trade Center as the second tower was collapsing. He rushed to the site as soon as he heard the news. His firehouse members were down there already, and they were all sent in the building. He spent the first three months searching for his colleagues on the pile. He would go from the pile, to the firehouse, and right back to the pile. He was working on search and recovery at the World Trade Center site for at least three months, if not longer. After that, he was the liaison for the FDNY widows.

7. In 2009, I started to notice that Ray was limping and questioned him about it. He thought that it was just a hip injury or maybe he had pulled something. I made him go to the radiologist near our home. The radiologist took one look at the x-rays of Ray's hips and pelvis and sent him straight to Sloan Kettering. The scans showed that his leg was disintegrating due to a quickly-growing cancer. The cancer specialist confirmed that he had metastatic kidney cancer. Ray underwent two surgeries, one to remove the bad kidney and one to remove the tumors that were growing on his femur. The cancer spread to his lower leg, then to the bones in his shoulders, and later to his brain and lymph nodes.

8. There was no warning when it came to Ray's cancer. It spread so quickly. After the initial kidney surgery, we tried everything – experimental pills, chemotherapy, and radiation. In 2015, while he was still working at the firehouse, Ray suffered a heart attack on the job. We learned that the heart attack was a side effect of the chemotherapy, which had damaged the back of his heart. After that incident, Ray had to retire from the FDNY.

9. It was heartbreaking to watch my husband in so much pain. It was devastating to watch him suffer through all those surgeries and treatments. He couldn't do the things he wanted to do anymore. It would break your heart if you talked to him. There were things we wanted to do together that we didn't get a chance to do. I never wanted to talk with him about the possibility of his death. We were both in denial on that front.

10. My children and I were very committed to his care. I was still working at the time, and I modified my work schedule around Ray's illness so I could be there when he needed me. The FDNY helped out, too. They had a "family van," where the off-duty firemen would drive Ray into the city to go to Sloan Kettering. When Ray was home, I would cook for him and

make sure he took his medications at all the right times. During that time, Ray became a spokesperson for the 9/11 community. He made many trips to Washington D.C. to advocate for those suffering from 9/11-related illnesses. He worked with the FDNY, the NYPD, the FealGood Foundation, Barasch & McGarry, and Jon Stewart to raise awareness and advocate on behalf of the 9/11 community. He helped to change the laws that applied to 9/11 survivors and the families of victims. First, the healthcare for spouses. He was also instrumental in having the Victim Compensation Fund extended for another ninety years. He also went to Fort Totten and worked with the army on counter-terrorism efforts. That really raised his spirits, even as he became more ill. He loved being involved. Even though he wasn't fighting fires anymore, he wanted to give back.

12. Ray was an amazing person. Everyone who knew him still talks about him. He left an amazing legacy that everyone will remember. What he did for the 9/11 community will live on in our memories. He was just that guy. He would help anyone who was in need. He constantly was taking phone calls from firemen, police officers, and other first responders, talking to them about what they needed to do if they became sick from 9/11-related illnesses. He always wanted to help people and make them feel seen and heard. He is well known for what he did for others, and I will always be proud that he was my husband.


CARYN PFEIFER

Sworn to before me this
19th day of May, 2022



Notary Public

KEVIN P. MATTHEWS
NOTARY PUBLIC
State of New York
No. 4841605
Qualified in Suffolk County
Commission Expires April 30, 2023